

# EXHIBIT C

1 UNITED STATES DISTRICT COURT OF MASSACHUSETTS  
2 BOSTON DIVISION  
3

4 GIBSON FOUNDATION, INC., A Delaware Corporation,

5 Plaintiff,  
6

7 -against-

Case No.  
1:20-CV-10682-IT  
8

9 ROB NORRIS d/b/a THE PIANO MILL,  
10 A CITIZEN OF MASSACHUSETTS; THE  
PIANO MILL GROUP, LLC,

11 Defendants.  
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12 DEPOSITION OF  
13 ROBERT NORRIS  
14

15 June 25, 2021

16 10:02 a.m.

17 Job No: 381641  
18

19 VIDEO CONFERENCE  
20

21 DEANNA JACKSON  
22 Notary Public - New York State  
23 Qualified in New York City  
My Commission No. 01JA624392  
Expires August 29, 2023  
24

Transcript of Robert Norris  
Conducted on June 25, 2021

25

1 Q. Were you asking to have a piano to restore and  
2 give it back to them, or have a piano to restore and  
3 keep?

4 A. Have a piano to restore, and keep.

5 Q. After these e-mails with Tom, what happened to  
6 lead you to be in the possession of the Liberace  
7 Piano?

8 A. I believe he gave me the number of Bill  
9 Knauer -- at this time line, with this e-mail,  
10 nothing further took place. We had this conversation  
11 and nothing took place until another conversation  
12 that I had with Tom.

13 Q. Was that conversation through e-mail?

14 A. I believe it was a phone conversation.

15 Q. What was that conversation about?

16 A. I believe he called me and said "We might have  
17 an SD-10 that you would be interested in. I'm not  
18 sure if it really is what you're looking, but here's  
19 the number of Jim Felber, call him."

20 Q. What happened with that?

21 A. I called Mr. Felber.

22 Q. What was that conversation?

23 A. I think there was more than one conversation.  
24 I think the first conversation he told me that there

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1 was an SD-10 in the Hammerstein Ballroom. He said it  
2 was online if I would get it out. It was there for a  
3 very short period of time. I believe he said, it's  
4 all yours, but you have to get it out by the end of  
5 the week, which was not a small task because it was  
6 in New York city, and I believe it was on the 7th  
7 floor.

8 Q. What happened after that?

9 A. I called him again, and told him that I  
10 couldn't get down there within the allotted time with  
11 a crew. I didn't say I couldn't get down there, I  
12 said I couldn't get my moving crew down there within  
13 the allotted time to get it.

14 Q. Did you tell him that you could pick it up?

15 A. Yes.

16 Q. Was there any written communication, or was it  
17 all telephone?

18 A. I don't believe so.

19 Q. Do you remember the date he said you had to  
20 pick it up by?

21 A. No.

22 Q. Was it in 2011?

23 A. Yes.

24 Q. Where did you pick it up from?

Transcript of Robert Norris  
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1 A. The Hammerstein Ballroom in New York city.

2 Q. That was on the 7th floor?

3 A. I believe so. It was on the top floor.

4 Q. Were you there personally when the piano was  
5 transported?

6 A. No.

7 Q. Did you hire a company to do that for you?

8 A. No.

9 Q. Who moved it for you?

10 A. My own moving crew.

11 Q. Those were employees by Piano Mill?

12 A. My movers have always been subcontractors  
13 because they move for several people.

14 Q. How long does it normally take to get the  
15 piano out of your building and get it restored?

16 A. I believe it took them at least a few hours to  
17 get it packed up, to get it down, you know, it was an  
18 entire day round trip, you know? It was a long day.  
19 We started early in morning, and got back early that  
20 night.

21 Q. But, it was delivered to your store within  
22 twenty-four hours?

23 A. I believe it was originally brought to my  
24 restoration shop, which was at a different location

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1 at that time.

2 Q. Where was that?

3 A. That would be in Hampton, Massachusetts.

4 Q. How did they get it from the 7th floor down?

5 A. I believe they told me -- the term was -- it  
6 was hoisted down to the middle of the building.

7 Q. How much did all of that cost?

8 A. I don't have a figure to throw out at you. I  
9 would have to give that more thought.

10 Q. Was it more than \$10,000?

11 A. Just for transportation of the piano?

12 Q. Yes. Just to get it out of the ballroom and  
13 to your restoration shop.

14 A. No, it wasn't more than \$10,000.

15 Q. Was it more that \$5,000?

16 A. No.

17 Q. Do you have any documentation that would show  
18 how much it cost to you?

19 A. Not at the ready, no.

20 Q. Would that ever exist?

21 A. Well, it would just be documentation as to  
22 what I paid my guys.

23 Q. That doesn't exist anymore, or do you have it  
24 in your store?

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1 A. It would be an old bank statement.

2 Q. Do you remember what day the Liberace Piano  
3 was moved out of New York?

4 A. When they left New York? I don't recall.

5 Q. Do you recall what day it was delivered?

6 A. It was brought to me the same day it left New  
7 York, at the end of the day, late.

8 Q. You said that went to your Hampton,  
9 Massachusetts restoration store?

10 A. Correct.

11 Q. When did it get to the actual Piano Mill  
12 store?

13 A. Not until I bought my new building in  
14 Rockland, that I had enough room for it.

15 Q. Do you remember when that was?

16 A. It would have been sometime in 2011, I think.  
17 Early, 2011.

18 MS. WEATHERLY: If we could scroll to  
19 page 4.

20 Q. Mr. Norris, do you recognize this e-mail?

21 A. Yes.

22 Q. Sir, prior to this e-mail date, the July 14,  
23 2011, did you ever contact Gibson to let them know  
24 that you had picked up the piano?